

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALBERT MAJORS IV,

Plaintiff,

-against-

**PLAINTIFF'S PROPOSED
VOIR DIRE QUESTIONS**

10 CV 4730 (BMC)

ROBERT PUMILIA SHIELD NO. 10574, BRIAN RODER, SHIELD NO. 27358, and JOHN and JANE DOE 1 through 10, individually and in their official capacities, (the names John and Jane Doe being fictitious, as the true names are presently unknown),

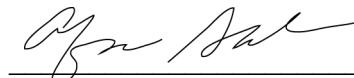
Defendants.

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Pursuant to the Court's individual practices, Plaintiff Albert Majors IV respectfully submits the following list of proposed questions for prospective jurors.

DATED: June 13, 2011
New York, New York

HARVIS & SALEEM LLP



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Attorneys for Plaintiff

1. Please tell us about your work experience, beginning with who you work for now and what your job is.
2. What neighborhood do you live in?
3. Where are the other members of your immediate family or household employed?
4. What is your highest level of education?
5. What television shows do you watch regularly?
6. What newspapers and magazines do you read, including online publications?
7. Were you ever in the military?
 - (a) What ranks did you hold?
 - (b) What duties did you have?
 - (c) Were you ever in the military police?
8. Have you ever served on a jury before? If so, please identify the location and nature of the case or cases on which you served. Was it civil or criminal? Did you deliberate?
9. Have you or has any member of your household, ever been a party to a lawsuit? If so, please explain.
10. Do you know anyone currently or previously employed by Harvis & Saleem LLP or the New York City Law Department?
11. Do you know Gabriel Harvis, Afsaan Saleem, Sumit Sud or Philip DePaul? If so, please explain.
12. Do you have any opinions concerning the New York City Police Department?
 - (a) What are they?
13. Have you or any member of your family, household or a close friend ever been the victim of a crime?
 - (a) What was the nature of the crime?
 - (b) Was the perpetrator punished?
 - (c) What was the result?

(d) Were you satisfied with the results?

14. Have you or has any member of your immediate family, household ever held any job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?
15. Have any of your neighbors, friends or relatives ever held a job in (a) a law enforcement agency, (b) any government agency, (d) the state or local police, (d) the FBI, (e) any prosecutor's office, (f) probation or parole agency or (g) a private detective or security guard agency?
16. Does your job cause you to work with any law enforcement officer or agency?
17. If a civilian and a police officer give conflicting testimony about the same incident, would you be inclined to believe the police officer over the civilian and why?
18. This is a case in which a man has sued two New York City police officers alleging civil rights violations. Would you have any difficulty being completely fair and impartial in such a case? If so, please explain in the absence of the other members of the panel.
19. Would you have any difficulty returning a verdict in favor of a person who could prove he was falsely arrested by a police officer?
20. Do you have feelings or believe that lawsuits are not the proper way for someone to seek compensation for an injury they believe was caused by someone else?
21. Do you believe that you could not, for whatever reason, place a dollar value on Mr. Majors' injuries, including injuries for lost liberty and lost wages even though the evidence and the law may support that he be compensated for those items?
22. Would you have any trouble awarding damages not just to compensate a person for injuries, but to punish a police officer who abused his authority?
23. Do you have a maximum sum of money that you would never exceed in an award to Mr. Majors even if the evidence and the law to be applied support a larger amount of money?
24. Do you know anyone who lives in a housing project or a building operated by the New York City Housing Authority?

25. Have you or a member of your family or household, or a close friend, ever been stopped by the police? What were the circumstances?
26. Have you or a member of your family or household, or a close friend, ever been arrested? What were the circumstances?
27. Do you have strong views regarding the use of marijuana? If so, what are they?
28. Have you ever given testimony at a trial or other court proceeding?